

# **EXHIBIT E**

COTTON  
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TIGHE &  
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*Attorneys at Law*

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Terry W. Rhoads Attorney • (432) 685-8570 DIRECT • (432) 684-3161 FAX • trhoads@cbtd.com

October 30, 2020

Mr. Brian Carney  
1202 W. Texas Ave.  
Midland, Texas 79701

RE: Complaint of Harassing Behavior/Stalking  
Complainant/Victim: Dr. Bob Fu & Family  
Dates of Incidents: September 26, 2020 - Current

Dear Mr. Carney,

According to public records it is our understanding you represent the following people:

- Ms. Dongna Fang;
- Mr. Chen Qisheng;
- Ms. Liping Nettesheim; and
- Ms. Rongliang Starks.

Pursuant to your representation of these individuals, please see the enclosed *Demand to Cease and Desist Harassment/Stalking of Bob Fu and Family* to the above individuals.

Very truly yours,

COTTON, BLEDSOE, TIGHE & DAWSON, P.C.



Terry W. Rhoads

TWR/djw

cc: Mayor Patrick Payton  
City Attorney John Ohnemiller  
Chief Seth Herman, Midland Police Department  
District Attorney Laura Noldolf

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bcc (via email):

Bob Fu  
Doug Robison  
Larry Gilbert  
Chad Bullard  
Judge Ken Starr  
Chris Aycock  
Jake Adams

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October 30, 2020

Ms. Dongna Fang  
c/o Brian Carney, Attorney  
Law Office of Brian Carney  
1202 W. Texas Avenue  
Midland, TX 79701

Re: Demand to Cease and Desist Harassment/Stalking of Bob Fu and Family

Dear Ms. Fang:

This law firm represents Bob Fu, his family, and ChinaAid Association, Inc. arising from your and your comrades' constant harassing behavior, threats and defamatory statements directed to Dr. Fu, his family, and the non-profit (ChinaAid) he manages. Demand is hereby made to immediately cease your harassing behavior. You and your comrades, by your/their continued presence in front of his residence and repeated attacks on Dr. Fu directly and indirectly, have trampled on precious rights of the homeowners and their families to enjoy the peace and tranquility to which a home is entitled.

Your conduct, along with the conduct of those leaders to whom you answer and those acting in concert with you, include threats of death, violence, as well as daily publications of defamatory statements directed specifically to Dr. Fu, his family, and ChinaAid. You, Guo Wengui (a/k/a Miles Kwok), and those acting in concert with you have repeatedly engaged (and continue to engage) in behavior that is designed to torment, abuse, scare, alarm, annoy, and embarrass Dr. Fu and his family, as well as reasonable people of the Midland community. By your and your comrades' repeated threats and harassing behavior, you and those of your comrades stationed almost daily since September 26 in front of Dr. Fu's house in the Polo Park subdivision have created a nuisance that burdens and has deprived other homeowners of their rights to safe, comfortable homes and quality of life.

Your and your groups' actions have escalated and constitute stalking of Dr. Fu and his family. Now, Dr. Fu, his family and neighbors fear for their safety and well-being. This is especially so, given that others under Guo Wengui have engaged in violence against those he targets.

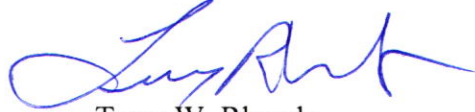
Your, your comrades', and your leaders' refusal to immediately cease this harassing behavior/stalking, will be addressed and adjudicated to the fullest extent permitted under the laws

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of our city, state, and of our nation. We trust you will properly respond and halt your ongoing misconduct and unlawful campaign against Dr. Fu and his family.

Very truly yours,

COTTON, BLEDSOE, TIGHE & DAWSON, P.C.

A handwritten signature in blue ink, appearing to read "Terry Rhoads", with a stylized, flowing script.

Terry W. Rhoads

TWR/djw

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October 30, 2020

Mr. Chen Qisheng  
c/o Brian Carney, Attorney  
Law Office of Brian Carney  
1202 W. Texas Avenue  
Midland, TX 79701

Re: Demand to Cease and Desist Harassment/Stalking of Bob Fu and Family

Dear Mr. Qisheng:

This law firm represents Bob Fu, his family, and ChinaAid Association, Inc. arising from your and your comrades' constant harassing behavior, threats and defamatory statements directed to Dr. Fu, his family, and the non-profit (ChinaAid) he manages. Demand is hereby made to immediately cease your harassing behavior. You and your comrades, by your/their continued presence in front of his residence and repeated attacks on Dr. Fu directly and indirectly, have trampled on precious rights of the homeowners and their families to enjoy the peace and tranquility to which a home is entitled.

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Your, your comrades', and your leaders' refusal to immediately cease this harassing behavior/stalking, will be addressed and adjudicated to the fullest extent permitted under the laws of our city, state, and of our nation. We trust you will properly respond and halt your ongoing misconduct and unlawful campaign against Dr. Fu and his family.

Very truly yours,

COTTON, BLEDSOE, TIGHE & DAWSON, P.C.

A handwritten signature in blue ink, appearing to read "Terry Rhoads", with a stylized flourish at the end.

Terry W. Rhoads

TWR/djw

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October 30, 2020

Ms. Liping Nettesheim  
c/o Brian Carney, Attorney  
Law Office of Brian Carney  
1202 W. Texas Avenue  
Midland, TX 79701

Re: Demand to Cease and Desist Harassment/Stalking of Bob Fu and Family

Dear Ms. Nettesheim:

This law firm represents Bob Fu, his family, and ChinaAid Association, Inc. arising from your and your comrades' constant harassing behavior, threats and defamatory statements directed to Dr. Fu, his family, and the non-profit (ChinaAid) he manages. Demand is hereby made to immediately cease your harassing behavior. You and your comrades, by your/their continued presence in front of his residence and repeated attacks on Dr. Fu directly and indirectly, have trampled on precious rights of the homeowners and their families to enjoy the peace and tranquility to which a home is entitled.

Your conduct, along with the conduct of those leaders to whom you answer and those acting in concert with you, include threats of death, violence, as well as daily publications of defamatory statements directed specifically to Dr. Fu, his family, and ChinaAid. You, Guo Wengui (a/k/a Miles Kwok), and those acting in concert with you have repeatedly engaged (and continue to engage) in behavior that is designed to torment, abuse, scare, alarm, annoy, and embarrass Dr. Fu and his family, as well as reasonable people of the Midland community. By your and your comrades' repeated threats and harassing behavior, you and those of your comrades stationed almost daily since September 26 in front of Dr. Fu's house in the Polo Park subdivision have created a nuisance that burdens and has deprived other homeowners of their rights to safe, comfortable homes and quality of life.

Your and your groups' actions have escalated and constitute stalking of Dr. Fu and his family. Now, Dr. Fu, his family and neighbors fear for their safety and well-being. This is especially so, given that others under Guo Wengui have engaged in violence against those he targets.



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Your, your comrades', and your leaders' refusal to immediately cease this harassing behavior/stalking, will be addressed and adjudicated to the fullest extent permitted under the laws of our city, state, and of our nation. We trust you will properly respond and halt your ongoing misconduct and unlawful campaign against Dr. Fu and his family.

Very truly yours,

COTTON, BLEDSOE, TIGHE & DAWSON, P.C.

A handwritten signature in blue ink, appearing to read "Terry Rhoads", is written over the printed name.

Terry W. Rhoads

TWR/djw

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October 30, 2020

Ms. Rongliang Starks  
c/o Brian Carney, Attorney  
Law Office of Brian Carney  
1202 W. Texas Avenue  
Midland, TX 79701

Re: Demand to Cease and Desist Harassment/Stalking of Bob Fu and Family

Dear Ms. Starks:

This law firm represents Bob Fu, his family, and ChinaAid Association, Inc. arising from your and your comrades' constant harassing behavior, threats and defamatory statements directed to Dr. Fu, his family, and the non-profit (ChinaAid) he manages. Demand is hereby made to immediately cease your harassing behavior. You and your comrades, by your/their continued presence in front of his residence and repeated attacks on Dr. Fu directly and indirectly, have trampled on precious rights of the homeowners and their families to enjoy the peace and tranquility to which a home is entitled.

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Your and your groups' actions have escalated and constitute stalking of Dr. Fu and his family. Now, Dr. Fu, his family and neighbors fear for their safety and well-being. This is especially so, given that others under Guo Wengui have engaged in violence against those he targets.

October 28, 2020  
Page 2

Your, your comrades', and your leaders' refusal to immediately cease this harassing behavior/stalking, will be addressed and adjudicated to the fullest extent permitted under the laws of our city, state, and of our nation. We trust you will properly respond and halt your ongoing misconduct and unlawful campaign against Dr. Fu and his family.

Very truly yours,

COTTON, BLEDSOE, TIGHE & DAWSON, P.C.



Terry W. Rhoads

TWR/djw



November 8, 2020

Mr. Guo Wengui (a/k/a Miles Kwok,  
a/k/a Wengui Guo, a/k/a Miles Guo,  
a/k/a Ho Wan Kwok)  
781 Fifth Avenue,  
New York, NY 10022

GTV Media Group, Inc.  
162 East 64th Street  
New York, NY, 10065

Mr. Guo:

For the past several months, you, your media companies and platforms, and your individual agents have orchestrated a malicious campaign of character assassination and defamation against me and my nonprofit organization, ChinaAid. You have repeatedly and systematically issued knowingly false and defamatory statements against me and my organization, both over the internet and through your agents in Midland, Texas, in an effort to smear me and my organization in various ways. These knowingly false and malicious statements include accusations that I am a Chinese Communist Party (CCP) spy, a fake priest, a human trafficker, a money launderer, a domestic abuser, a peddler of lies, and an evil person.

To advance your campaign of vilification against me and my organization, ChinaAid, you have intentionally misled the public with slander, libel, and defamatory images, which you have broadcast to hundreds of thousands of people. You and your agents have directed and overseen the distribution of flyers, articles, signs, images, social media posts, live video broadcasts, and other materials containing knowingly false and misleading statements intended to disparage my name and encourage protesters outside my home in Midland, Texas to intimidate and harass my family.

These false statements were neither isolated nor made incidentally, but were purposefully disseminated across a range of social media platforms and broadcasting services in which you take whole or partial ownership in, or provide consulting services to, including the websites *gnews.org* and *gtv.org*. Your reckless actions have encouraged your hundreds of thousands of followers on social media and across the internet to repeat your false allegations against me, to harass and intimidate my family, and to malign my name and that of my organization, ChinaAid. Your followers, in turn, have issued numerous death threats against me and continue to repeat your false and unfounded attacks that I am a “CCP spy,” a “fake priest,” and “evil.”

Over a span of weeks, day after day, through these various media platforms, you made the following false and malicious defamatory statements:

- From September 24 – October 6, 2020, you posted a series of videos on your Chinese-language and English-language Twitter accounts (@VOG\_2020 and @VOG2020, respectively) and your website *gtv.org*, in which you falsely accuse me of being “a CCP spy” and a “fake democracy activist” who “deserve[s] to die.” You also wrongly accuse

me of having orchestrated fraudulent asylum claims and having laundered millions of dollars through dumpling houses owned by pro-democracy activist and U.S. citizen Sasha Gong. You falsely asserted that sufficient evidence exists for “Bob Fu... to spend the rest of his life in prison.”

- On October 4, 2020, you and your agents directed and oversaw the distribution of defamatory flyers throughout neighborhoods and churches in Midland, Texas, which falsely accuse me of being a “fake priest and CCP spy.”
- On October 7, 2020, you posted a video on your Twitter accounts and website *gtv.org* in which you falsely accuse me of having encouraged my peaceful, law abiding congregation of committed Christians to commit acts of violence and harassment.
- On October 9, 2020, you and your agents published an article on *gnews.org* entitled *Miles Guo: Bob Fu, the Fake Pastor Thought He Was Being Clever, But Played Right into Our Hands*, in which you falsely accuse me of having bribed the Mayor of Midland, Texas, Honorable Patrick Payton, and having committed other criminal acts. You also falsely accuse me of being associated with the Chinese Ministry of State Security (MSS).
- On October 10, 2020, you and your agents published an article on *gnews.org* entitled *Religion Rally – Another Maneuver of a Disguised CCP Spy, “Pastor” Bob Fu?*, in which you once again sought to smear my reputation by falsely tying me to the CCP and the MSS.
- On October 12, 2020, you issued a statement on your English-language Twitter account (@VOG2020) in which you falsely suggest that I am currently under investigation by U.S. law enforcement officials for being a “fake pastor” and “CCP minion.”
- On October 21, 2020, you and your agents published an article on *gnews.org* entitled *An Open Letter to Mayor Patrick Payton, Senator Ted Cruz, and Senator Marco Rubio*, in which you refer to me as a “religious quack” and falsely accuse me of being a “secret agent” for the CCP who has bribed U.S. officials and committed espionage.
- From October 9 – October 30, 2020, you and your agents disseminated grotesque and innumerable caricatures of me portrayed as a communist devil and CCP spy, in which you label me “fake pastor,” “religious quack,” “fake democracy activist,” “CCP minion,” “pro-democracy imposter,” “phony democracy fighter,” “evil,” and other false and defamatory labels.

These statements are utterly and entirely false. My life in the United States has been devoted to Christian ministry and the cause of freedom and human dignity. Consistent with my long-held Christian faith and my duties as a husband and as a father to three children, I have never committed the vile acts of which you accuse me. Nor have I ever encouraged anyone else to threaten, intimidate, or commit acts of violence against another human life. You have falsely and maliciously accused me of human trafficking when you know that I have stood steadfastly in favor of the cause of victims of this human scourge. You have also falsely and maliciously accused me of having laundered funds and received funds improperly for purposes of assisting in asylum



claims. Your statements are a direct affront to my integrity as a Pastor and the integrity of ChinaAid as law-abiding and unapologetically Christian nonprofit organization.

I am not, nor have I ever been, a member of the Chinese Community Party. I fled Communist oppression as a religious refugee in 1997. Since then, I have operated my nonprofit organization with integrity, compassion, and with full adherence to the laws of the United States – especially in carrying out the activities at the heart of my Christian ministry, such as providing assistance to religious refugees and prisoners of conscience.

On my personal Twitter account, @BobFu4China, I have offered you and your followers my prayers and urged you to seek repentance according to God's promise expressed in John 3:16. I have declared God's love for you and your followers. I have urged our Christian brothers and sisters to pray for you and to refrain from engaging in any form of counter-protests, offering instead that they share the Gospel of Jesus Christ and God's love with you and your followers. Still, you, your media companies and platforms, and your individual agents continue to issue false and defamatory statements against me and my ministry, and threaten the safety of my family's home.

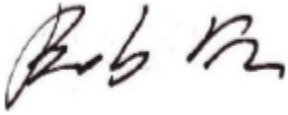
Despite overwhelming condemnation of your behavior by United States Senators, Members of the U.S. House of Representatives, United States Ambassadors, the Mayor of my family's adopted home in Midland, Texas, and various religious and human rights organizations, you, your media companies and platforms, and your individual agents have continued to levy an unrelenting broadside of false and malicious attacks against me personally and my nonprofit organization. Your statements have now provoked threats of suicide, homicide, and arson deemed credible by local and federal law enforcement authorities. Day after day, you have disrupted the regular use and enjoyment of my family's home, as well as the homes of my neighbors. You have unduly burdened the wellbeing of my family, including disrupting the continued attendance at school of my 15-year old daughter. My children have not seen their father in weeks, and your threats of violence and other provocations have caused them to reasonably fear for my safety as well as their own.

You have trampled day after day, week after week, on my reputation and my livelihood. You have spewed falsehood and waged a campaign of deceit; your defamatory statements have provoked threats of actual violence against me and my property. Accordingly, **I, Xiqu (Bob) Fu, hereby demand forthwith a full and complete retraction and disavowal of every one of the above inflammatory and unfounded charges against me and my organization, ChinaAid.** I further demand that you immediately cease and desist from summoning your followers to take action, including, but not limited to, advocating the use of physical violence against me, my property, and my organization. I further demand that you cease and desist from referring to my name or that of my nonprofit organization in a false and unflattering light, whether by slander, libel, or any other actionable means of defamation.

Both in my personal and individual capacity as a human being – and as CEO of the nonprofit ministry ChinaAid – I demand that this comprehensive, unconditional retraction be issued immediately through the same platforms and media vehicles you have employed in espousing your vicious and actionable campaign of lies. Should you fail to timely comply with this formal demand and issue a complete retraction in the public forum, in writing and by the same digital means employed by you and your controlled entities, and cease forthwith from spreading falsehoods

about me and my organization, I reserve the right to pursue all remedies that are afforded to me by the laws and Constitution of the United States and the State of Texas.

Sincerely,



Xiqu (Bob) Fu  
Founder and President,  
ChinaAid Association  
P.O. Box 8513  
Midland, TX 79708

cc:

Saraca Media Group, Inc.  
162 East 64th Street,  
New York, NY, 10065

Voice of Guo Media, Inc.  
1850 W Orange Grove Rd  
Tucson, AZ 85704-5427

Lihong (Sara) Wei Lafrenz  
1673 W Blue Horizon St  
Tucson, AZ 85704-1443

Donga Fang  
21 Maynard St.  
San Francisco, CA 94112

Rongliang Starks  
3022 Barnhill Ln.  
Sugar Land, TX 77479

Liping Nettesheim  
6666 Harbor Town Dr. A209  
Houston, TX 77036

Chen Qisheng  
28914 Golden Spike Ct  
Katy, TX 77494